

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

J. ENDRES	:	Case No. 5:17-cv-2408
	:	
Plaintiff	:	JUDGE SARA LIOI
	:	
v.	:	
	:	
NORTHEAST OHIO	:	
MEDICAL UNIVERSITY, et al	:	
	:	
Defendants	:	

MOTION FOR LEAVE TO WITHDRAW AND SUBSTITUTE COUNSEL

For the reasons set forth below, and pursuant to Local Rule 83.9, Plaintiff respectfully requests that the Court enter an order allowing the withdrawal as counsel for Plaintiff the firm of Marshall and Forman, and undersigned counsel John R. Marshall and Edward R. Forman, and substitute as counsel the law firm of Rosenberg & Ball Co., LPA, and attorneys Eric J. Rosenberg, Tracy L. Turner, and Carrie Menikoff.

MEMORANDUM IN SUPPORT OF MOTION

Plaintiff Julian Endres has ended the attorney client relationship with present counsel, the firm of Marshall and Forman, and undersigned counsel John R. Marshall and Edward R. Forman, and has retained the law firm of Rosenberg & Ball Co., LPA, and attorneys Eric J. Rosenberg, Carrie L. Menikoff, and Tracy L. Turner to represent him in the above captioned matter. Mr. Endres has asked that we file this Motion seeking the substitution of counsel. Tracy L. Turner, who provides Of Counsel service to the firm will act as lead counsel. Ms. Turner is admitted to practice before the Northern District of Ohio. Eric J. Rosenberg, who is admitted in Ohio and in the Southern District of Ohio, will be applying for admission in the Northern District of Ohio. Because this request comes directly from the Plaintiff Mr. Endres, he is aware of (and has been sent a copy of this motion).

For these reasons, Plaintiff respectfully requests that the Court enter an order allowing undersigned and their local counsel to withdraw, and substituting Rosenberg & Ball Co., LPA, and attorneys Eric Rosenberg, Carrie Menikoff, and Tracy L. Turner as counsel for Plaintiff. Upon the granting of this motion, substitute counsel will promptly file their entry of appearance.

Respectfully submitted,

OF COUNSEL:

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CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing was filed with the Court on this 20th day of March, 2020, using the CM/ECF system, which will send notification of such filing to all counsel of record. Parties may access this filing through the court's filing system.

By: /s/ John S. Marshall
John S. Marshall (0015160)